

MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.

www.moodklaw.com

NEW JERSEY OFFICE  
Cherry Tree Corporate Center  
Suite 501  
535 Route 38 East  
Cherry Hill, NJ 08002  
(856) 663-4300 Fax: (856) 663-4439

**Jonathan R. Stuckel**  
Member NJ & PA Bars  
(856) 406-1319  
JStuckel@moodklaw.com

May 25, 2022

**Via ECF**

The Honorable James B. Clark, III  
United States District Court  
Martin Luther King Jr. Federal Building and Courthouse  
50 Walnut Street, Room MLK 2A  
Newark, New Jersey 07102

**Re: Morales v. Healthcare Revenue Recovery Group, LLC**  
**Case No. 2:15-cv-08401-ES-JAD**

Dear Judge Clark:

I represent Defendant in this matter. On April 11, 2022, the Court entered an Order requiring HRRG to produce additional documents (ECF 157). Due to limited internal resources and complications associated with producing some of the additional account notes, Defendant respectfully requests a thirty (30) day extension of both the May 31, 2022 production deadline and the June 30, 2022 class certification deadline.

Counsel for Plaintiff consents to this request for an extension of deadlines. Thank you in advance for Your Honor's consideration.

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

/s/ Jonathan R. Stuckel  
Christian M. Scheuerman, Esquire  
Jonathan R. Stuckel, Esquire

JRS/emmm  
cc: Yongmoon Kim, Esquire

{M0104198.1}

Philadelphia	Pittsburgh	Westchester County	Wilmington	Towson	New York
Pennsylvania	Pennsylvania	New York	Delaware	Maryland	New York